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File Number:

August 12, 2020

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**BY ECF**

The Hon. Katherine Polk Failla  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Uniformed Fire Officers Ass'n, et al. v. de Blasio, et al.*, 20-cv-05441-KPF**

Dear Judge Failla:

I write to request that the Court grant leave to participate as *amici curiae* in the above-captioned case to the NAACP Legal Defense and Educational Fund, Inc. ("LDF"), the Lawyers' Committee For Civil Rights Under Law ("LCCR"), LatinoJustice PRLDEF ("LatinoJustice"), and Law For Black Lives (together, "Proposed *Amici*"). The subject of this lawsuit – public access to the disciplinary records of New York City police officers, and others – is central to the work of Proposed *Amici*, and Proposed *Amici* respectfully submit that they can assist the Court in addressing the questions at issue in this case. See *Office of the Comptroller of the Currency v. Spitzer*, 5-cv-5636-SHS, Dkt. No. 20 (S.D.N.Y. Aug. 5, 2005) (order granting LDF leave to participate as *amicus curiae* in opposition to motion for preliminary injunction).

Since its inception, the LDF has sought to eliminate the arbitrary role of race in the administration of the criminal justice system by challenging laws, policies, and practices which discriminate against Black Americans and other communities of color. Among other things, LDF is lead counsel in *Davis, et al. v. City of New York and New York City Housing Authority*, 10-cv-699-AT-HBP (S.D.N.Y.), a class-action lawsuit which is part of the court-ordered monitoring of the New York City Police Department ("NYPD") and seeks systemic reform of the NYPD's discriminatory trespass enforcement practices against Black and Latinx residents of public housing. The LCCR is a civil rights organization founded in 1963 at the request of President John F. Kennedy. It seeks to secure equal justice for all through the rule of law and, in particular, it challenges and seeks to rectify racial disparities within the criminal justice system.

LatinoJustice is a national non-profit civil rights legal defense fund, which advocates for and defends the constitutional rights of all Latinos to ensure their equal protection under the law. LatinoJustice has long been engaged in criminal justice reform advocacy and litigation across the country, challenging racially discriminatory policing practices such as “Stop & Frisk” in New York City, “Stop & Rob” in Suffolk County, and other forms of racial profiling which impinge upon the constitutional rights of Latinos. Law For Black Lives is a national community of lawyers and legal workers committed to providing legal and policy research to movement organizations in order to implement long-term transformation. In its work, Law for Black Lives’ priorities include bail reform and decriminalization.

If granted leave to participate, Proposed *Amici* will file their brief on or before August 14, 2020, which is the current deadline for written amicus submissions set by the Court.

Dated: August 12, 2020

Respectfully submitted,

/s/ Chris A. Hollinger

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Black Lives*

\*Application for admission *pro hac vice*  
pending

cc: All Counsel (via ECF)

Application GRANTED. Proposed Amici may file an amicus brief on or before August 14, 2020.

SO ORDERED.

Dated: August 12, 2020  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE